

THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Case No.: 1:21-cv-00309-CCE-JLW

NOVANT HEALTH, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b>LOCAL RULE 5.5 REPORT</b>
	)	<b>REGARDING FILING</b>
AMERICAN GUARANTEE AND	)	<b>DOCUMENTS UNDER SEAL</b>
LIABILITY INSURANCE COMPANY,	)	
	)	
Defendant.	)	
_____	)	

1. **Certification of L.R. 5.4 Conference:** The parties have discussed the issues of confidentiality raised in this case and the potential need for filing documents under seal. That discussion included the nature of any confidential documents that may be involved in the case, the possibility of using stipulations to avoid the need to file certain documents, and the possibility of agreed-upon redactions of immaterial confidential information in filings to avoid the need for filing documents under seal.

2. **L.R. 5.4(c) Default Procedures:** At this time, the parties do not anticipate that many documents will be filed under seal. The parties agree to use the default procedures of L.R. 5.4(c) and the Court's Revised Standard Preliminary Order For All Civil Cases, [D.E. 24], for the filing of sealed documents. In addition, if the party filing the motion to seal is not the party claiming confidentiality, the filing party must meet and confer with the party claiming confidentiality as soon as practicable, but at least two

business days before filing the documents, to discuss narrowing the claim of confidentiality. The motion to seal must certify that the required conference has occurred, and the party claiming confidentiality must file supporting materials required by L.R. 5.4(c)(3) within 14 days of the motion to seal.

Respectfully submitted this 12th day of November, 2021.

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